

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 25, 2002

David Alpert, Treasurer New York State Democratic Committee 60 Madison Avenue, Suite 1201 New York, NY 10010

Identification Number:

C00143230

Reference:

Amended 30 Day Post-Special Election Report (1/1/01-7/9/01), received

1/31/02

Dear Mr. Alpert:

This letter is to inform you that as of April 24, 2002, the Commission has not received your response to our request for additional information, dated April 3, 2002. This notice requests information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to this request (copy enclosed).

An adequate response must be received at the Commission by May 15, 2002. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter, please contact Angel Williamson on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or our local number (202) 694-1130.

Sincerely,

John D. Gibson

Assistant Staff Director Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463.

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Amended 30 Day Post-Special Election Report (1/I/01-7/9/01), received

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Dear Mr. Alpert:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Commission Regulations require that a committee disclose the identification of all individuals who contribute in excess of \$200 in a calendar year. (11 CFR §104.3(a)(4)(i)) Identification for an individual is defined as the full name, mailing address, occupation and name of employer. (11 CFR §100.12) Your report discloses contributions from individuals for which the identification is not complete.

You must provide the missing information, or if you are unable to do so, you must demonstrate that "best efforts" have been used to obtain the information. To establish "best efforts," you must provide the Commission with a detailed description of your procedures for requesting the information. Establishing "best efforts" is a three-fold process.

First, your original solicitation must include a clear and conspicuous request for the contributor information and must inform the contributor of the requirements of federal law for the reporting of such information. (11 CFR §104.7(b)(1))

Second, if the information is not provided, you must make one follow-up,

stand alone effort to obtain this information, regardless of whether the contribution(s) was solicited or not. This effort must occur no later than 30 days after receipt of the contribution and may be in the form of a written request or an oral request documented in writing. (11 CFR § 104.7(b)(2)) The request must:

- clearly ask for the missing information, without soliciting a contribution;
- inform the contributor of the requirements of federal law for the reporting of such information, and
- if the request is written, include a pre-addressed post card or return envelope.

Third, if you receive contributor information after the contribution(s) has been reported, you shall either a) file with your next regularly scheduled report, an amended memo Schedule A listing all the contributions for which additional information was received; or b) file on or before your next regularly scheduled reporting date, amendments to the report(s) originally disclosing the contribution(s). (11 CFR §104.7(b)(4))

Please provide the missing information or a detailed description of your procedures for requesting the information. For more information on demonstrating "best efforts," please refer to the Campaign Guide.

-On Schedule A supporting Line 11(a)(i) of the Detailed Summary Page, your report disclosed contributions from individuals that omit the aggregate year-to-date totals. Please amend your report by supplying the information. 11 CFR §104.3(a)(4)(i)

The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the outstanding balance beginning the period of the next report. This report shows beginning outstanding balances to Adirondack Scenie; Amsterdam News; Dun & Bradstreet; Grand Hyatt; Mailtech Mailing Systems; National Credit Inc.; NCIC Inc; Sawchuck Brown Association; Staples Inc; Urban Kahn & Werlin; Whiteman, Osterman and Hanna; and Zale, Koff Graphics Inc, which are not identical to the ending outstanding balances for the creditors on the 2000 Year End Report. Please amend your report to clarify these discrepancies.

NEW YORK STATE DEMOCRATIC COMMITTEE PAGE 3

-On Schedule D of your previous report, you disclosed debts owed to the following vendors that have been omitted from this report:

Novell Inc.

AT&T Teleconference

Buffalo Convention Center

Communications Services

Telecom, Inc.

DNC Travel Offset

Fort Orange Press

Hanley Sign Co., Inc.

ImageCore Ltd.

Integrity Distribution

National Credit Service

NCA

Oxford Health Plans

Picotte Companies

Pier Waterfront Café

Public Works

Radisson Suites Hotel Buffalo

Specialized Audiovisual, Inc.

Mobile Media

Time Warner Cable of NYC

Eskay Business Systems

Ross Mailing Services

Rudin Management Corp.

Sprint

Central Computer Services

Chinese American Planning Council

CHUBB Life America

Conotabs Network

Harper Collins Publishers

NY Native Advertising

Payco/Mobile Comm.

Personal Supply Co.

NYNEX

PSI Net/Pipeline

Stonewall News

The November Group

Venture Graphics

Filtered Water Service Corp.

Helmsley Spear

Sheraton Hotel and Towers

Unity Environmental Corp.

Please note that you should continue to report all debts involved in a debt settlement plan until notified by the Commission that the plan complies with the Act and Regulations. (11 C.F.R. §104.11) Please amend your report to include these debts on Schedule D supporting Line 10 of the Summary Page.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule A supporting Line 15, Schedule B supporting Lines 21(b) and 29, and Schedule H4 supporting Line 21(a) of your report to clarify the following descriptions: expense refund and supplies. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule B supporting Line 29 of your report discloses a disbursement for an apparent refund or rebate to your non-federal account for a previously

allocated expense. Please be advised the refund or rebate must be allocated between the federal and non-federal accounts according to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the non-federal portion to the non-federal account using one of two methods.

The method of reporting described in Advisory Opinion 1995-22 allows a committee to itemize the refund or rebate as a negative entry on Schedule H4. Alternatively, a committee may disclose the receipt of the refund or rebate into the federal account on Schedule A supporting Line 15, and the transfer of the non-federal account's share to the non-federal account on Schedule H4. Please refer to the enclosed sample of properly reported refunds and rebates of allocable activity and amend your report as appropriate.

-Your report discloses in-kind contributions ("donations") from corporations on Schedule H4, supporting Line 21(a) of the Detailed Summary Page (pertinent portions attached). Pursuant to Advisory Opinion 1992-33, the Commission concluded that a "national party committee may accept corporate in-kind donations in connection with fundraising activities" as long as "the federal share of goods or services is paid or transferred to the non-federal account in advance" of the acceptance of the corporate in-kind donations by the federal account.

Advisory Opinion 1992-33 also discloses a detailed method for reporting the receipt and use of in-kind contributions as follows:

- 1. The transfer of the in-kind corporate contribution from the non-federal account to the federal account should be disclosed on Schedule H3. The itemization on Schedule H3 should include the date the Committee received the in-kind contribution, the amount of the contribution and the fundraising event involved.
- 2. The use or expenditure of in-kind corporate contributions should be disclosed on Schedule H4 as non-federal share disbursements. The itemization should provide the same donor identification information required on a Schedule A for in-kind contributions for Federal elections.
- 3. A second entry on Schedule H4 should then disclose the advance or

contemporaneous payment of the federal account's share of the in-kind corporate contribution to the non-federal account.

Please amend your report to properly disclose the in-kind corporate contributions received by your committee (example enclosed).

-On Schedule H4 supporting Line 21(a) of the Detailed Summary Page, you have failed to include the purpose of the corporate in-kind received from Cablevision Systems Corporation. Please amend your report to include this missing information.

-Schedule A supporting Line 15 of the Detailed Summary Page discloses a refund(s) or rebate(s) of what appears to be a previously disclosed allocable expense(s) from US News and World Report, Poland Spring Water, and Fleet Bank. Please be advised that when a committee receives a refund or rebate of an allocable expense, it must be allocated between the federal and non-federal accounts according to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the non-federal portion to the non-federal account and disclose this transferout on Schedule H4. Your report does not appear to disclose a transferout of the non-federal portion of this refund(s) or rebate(s). Please provide clarification regarding this apparent omission.

On Schedule H4 supporting Line 21(a), you disclose receiving a corporate in-kind from Cablevision Systems Corporation on 1/22/01. You also disclose that the federal share of the corporate in-kind was transferred on 1/23/01. Pursuant to Advisory Opinion 1992-33, the Commission concluded that a party committee may accept corporate in-kind contributions in connection with fundraising activities as long as the federal share of goods and services is paid to the non-federal account in advance or on receipt of the acceptance of the corporate in-kind donations.

Although the Commission may take further legal action concerning the acceptance of prohibited in-kind contributions, your prompt action in transferring the federal share to the non-federal account will be taken into consideration.

A response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days

NEW YORK STATE DEMOCRATIC COMMITTEE PAGE 6

of the date of this letter. <u>Electronic filers must file amendments in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended.</u> If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division). My local number is (202) 694-1130.

Sincerely,

My Williamson

Senior Reports Analyst

Reports Analysis Division

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DISBURSEMENT SCHEDULE H4 (FEC Form 3X) JOINT FEDERAL/NON-FEDERAL ACTIVITY SCHEDULE

FEC Schoolile H4 (Form XX) (Revised 1/2001)

FOR LINE 21s OF FORM 3X NAME OF COMMITTEE (In FUI) NEW YORK STATE DEMOCRATIC COMMITTEE Type of Allocated Activity: A. Full Name (Last, First, Middle Initial) Fundralsing Admin.Nater Drive Sualness Wire Direct Candidate Exempt Mailing Address Support P.O. Box 60270 Event Year-To-Date Zio Ссфа State Çüy 1186795.15 DRG 90080-0270 GΑ Los Angeles Purpose/Event. Category/ Typa Newspaper & Subscription 2001 Date Description: Newspaper & Subscription TOTAL AMOUNT NON-FEDERAL SHARE FEDERAL SHARE 100.00 87.50 12.60 Transaction ID: H4.5700 Type of Allocated Activity: A. Full Name (Last, First, Middle Initial) Fundralaing Admin Water Drive Cablevision Systems Derporation Direct Candidata Example Asencot Conlist Support Event Year-To-Date 1111 Stewart Avenue State Zip Cade City 421085.17 ORG 11714-3581 NY Bethpage Purpose/Event: Category/ In Kind Contribution 100% NF Т<u>уре</u> 2001 Q 1 Oata Description: In Kind Contribution 100% NF TOTAL AMOUNT NON-FEDERAL SHARE FEDERAL SMARE 30000.00 30000.00 0.00 Transaction ID: H4.5428 Type of Allocated Activity: A, Full Name (Last, First, Middle Initial) Fundralising Admin. Voter Orive. Cablevision Systems Corporation Direct Candidate Exempt Melling Address Support Event Year-To-Date 1111 Stewart Avenua State Zip Code Cltv 432577,13 ORG 11714-3581 NY Bethpage PurposelEvent: Catagory ustration fed share-above bans. Type 2001 Date Description: traff-non fed share-above trans. TOTAL AMOUNT NON-FEDERAL SHARE FEDERAL SHARE 3750.DO 0.00 2750.00 Transaction ID: H4.5427 SUBTOTAL of Joint Federal and Non-Federal Activity This Page TOTAL AMOUNT NON-FE0ERAL SHAR€ FEDERAL BHARE 33850.0D 30087.50 3762.50 TOTAL This Period (last page for each line only)(Federal share to 21(a)(I) and non-Federal share to 21(a)(I)) TOTAL AMOUNT FEDERAL SHARE NON-FEDERAL SHARE TOTAL This Period for the Non-Federal Share (Used for line 31 of the detailed summary page)

PAGE 208 / 423

11. Prohibited in-Kind Donations for Allocable Activities

While contributions from corporations, labor organizations and federal government contractors are prohibited under federal law, they are permissible under some state laws. If that is the case, such donations may be accepted by a nonfederal activity. However, the alluation is more complicated when donations of goods or services from such sources are made in connection with allocable activity, such as a fundraisor at which both federal and nonfederal funds are collected.

in AO 1992-33, the Commission explained now a committee can tagally accept an in-kind donation from a prohibited source in connection with an allocable administrative or fundraising activity. Note that the Commission has not addressed the receipt of in-kind donations from prohibited sources for the other types of allocable expenses (i.e., generic voter drives and candidate support activity).

Advance Payment of Federal Share

To evoid the receipt of a prohibited contribution by the federal account, that account must pay the nonfederal account for the federal share of the in-kind donation. This payment—a transfer to the nonfederal account—must be made in acounce or on the date the goods or services are received.

Par-Transaction Transfers

The federal transfer may be made on a pentranspection basis—that is, shortly before or on the same day the in-kind donation is received.

Escrow Transfers

Alternatively, the federal account may make bulk transfers to cover the federal share of anticipated in-kind donations. Under this "escrow" arrangement, a commistee makes a good lattle estimate of the amount of in-kind donations that it expects to rectaive and transfers sufficient funds from the federal account to cover the federal share.

Adjustments

Should the federal account pay more than its shere of an in-kind donation, adjustment transfers from the nonfederal account are permissible.

Basic Reporting of in-Kind Donations: Example

On October 1, a state party committee receives a \$5,000 in-kind donation of flowers from a corporation for a federal/ nonfederal fundraiser ("Chairman's Gala"). The estimated allocation ratio for the fundraiser is 50 percent federal and 50 percent nonfederal. That same day, the federal account transfers its share of the in-kind donation (\$2,500) to the nonfederal account.

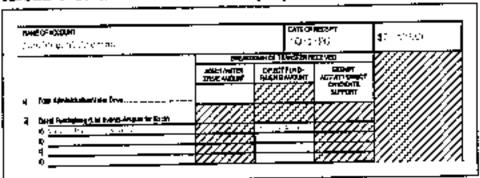
Required Forms

- Schedule H3—Transfers from Nonfederal Account
- Schedule H4—Payments for Allocable Expenses

Schedule H3—Receipt of In-Kind Donation

The committee reports the receipt of the in-kind donation as a transfer from the nonfederal account for the "Chairman's Gata" fundraiser. The date used here is the date the committee received the flowers.

RECEPT OF IN-KIND DONATION (H3)



The Schedule H3 shows the nonfederal account's receipt of the \$5,000 in-kind datastion of flowers on October 1.

"Disbursament" of In-Kind Donation (H4)

Like in-kind contributions, in-kind donations must be reported as both receipts and disbursements so as not to inflate the cash-or-hand balance. (The disbursement side reflects the use or 'expanditure' of the resources.) Schedule H4 is used for the disbursement entry, which shows the \$5,000 in-kind donation as a 100 percent nontederal disbursement. The donor's name and actiress is discussed in the box generally used for pay-

Transfer from Federal Account (H4)
The second entry on Schedule H4 shows
the contemporaneous transfer of \$2,500
(the federal share of the donation) from
the federal account to the numfederal account. The explanation of the transfer is
described in the "Purpose" box, with a reserence to the previous entry.

Alternative Reporting Method

To minicuze entries and evoid cupilication, a committee may use atternative methods to report transactions relating to in-kind donations.

The committee may use one entry on Schedute HS to show the receipt of all inkind donations made within the same reporting period for a particular fundralsing program or event (or administrative activity).

The committee may also use one entry on Schedule H4 to show total federal payments (transfers) made on the same day for the federal share of in-kind donations.

Example

A committee receives two in-kind donations from prohibited sources for a mixed federal monfederal fundrateing event, "July Fundrateer":

- Invitations donated by XYZ Printers, Inc. (value: \$3,000) received on July 1; and
- Balloons donated by ABC Balloons, Inc. (value: \$1,000) received on July 15.

The fundraising ratio for "July Fundraiser" is 50 percent federal, 50 percent nonfederal. The federal account transfers its \$2,000 share of the two donations on July 1.

DISBURSEMENT OF IN-KIND DONATION; FEDERAL TRANSFER (H4)

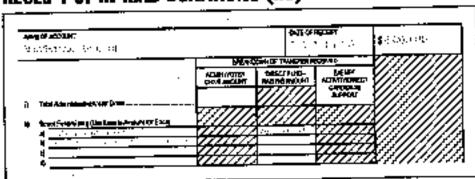
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The first entry allows the "disbursament" of the \$5,000 in-kind donation by the nonfederal account. The second entry shows the faderal account's transfer of its ahere of the donation (50 percent or \$2,500) to the honfaderal account.

Schedule H3—Receipt of in-Kind. Donations

The committee uses one entry on Schedule HS to show the total in-kind donations for "July Fundraiser" received during the reporting period. The "date of receipt" shows the period during which the committee received the contributions. The "July Fundraiser" entry cross references the Schedule H4 entries showing the "distrusement" of the donations and the identity of the contributors.

RECEIPT OF IN-KIND DONATIONS (H3)



The \$4,000 in-kind transfer represents a \$3,000 densition required on July 1 and a \$1,000 densition received on July 15. The entry notes the Schedule H4 entries where information on the densition is available.

Schedule H4—"Disbursement" of Donations; Federal Transfer Schedule H4 shows the 'disbursement' of the two In-kind donations by the nonfederal account, each entry identifying the donor and the dates the donations were received.

The third entry shows the federal account's payment for its 50 percent share of the two donations and the date of the mension to the nonfederal account. The entry refers to the previous two entries to show the transfer relates to those transactions.

"Escrow" Transfer

Advance transfers from the federal account to the nonfederal account to pey the federal share of anticipated In-kind donations are reported on Schedule H3. If known, the particular activity (fundraleing program/event or administrative) to which the transfer applies should be noted. If the corresponding in-kind donations are received in a later reporting period, it is understood that the Schedule H3 extry will not be able to list the related Schedule H4 donor entries (showing the nonfederal "disbursement" of the donations).

DISBURSEMENT OF IN-KIND DONATIONS; FEDERAL TRANSFER (H4)

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The livel two entries on this schedule provide information on the in-kind donations received and "disbursed" by the norticleral accounts. The third entry shows that the federal accounts 50 percent share of the donations was transferred to the norticleral account on July 1. The entry cross references the related entries.

10. Refunds and Rebates of Allocable Expenses

If a committee receives a refund or a rehale of an allocable expense, the refund or rebate must be deposited in the federal or allocation account. The refund or rebate must then be allocated between the federal and nonfederal accounts according to the same affection ratio used to allocate the original disbursement. The federal occount must transfer the nonfederal portion to the nonfederal account.

Example

A committee receives a \$400 rebate on office equipment from the Acme Office Store. The original purchase was an administrative expense alsocated according to the following ratio: 75 percent federal: 25 percent nonfederal.

Reporting Method 1 illustrates how this rebate would be reported according to the method approved in *Advisory Opinion* (AO) 1995-22. Reporting Method 2 shows how the rebate would be reported under an alternative method.

Reporting Method 1

Using the method of reporting described in AO 1995-22, the committee discloses the receipt of the rebate and the federal and nonfederal shares on Schedule H4. The amounts are negative entries subtracted from total shared federal and nonfederal discoverements for the reporting period (disclosed on Lines 21a(i) and (ii) of the Octailed Summary Page).

Reporting Method 2

Under the abornative method, the committee reports the receipt of the \$400 rebate under the catagory "Offsets to Operating Expenditures" on Line 15 of the Form 3X. Detailed Summary Page. The committee uses Schedule H4 to disclose the federal account for the nonfederal account for the nonfederal account for the nonfederal share.

ALLOCATION OF REBATE (H4) (METHOD 1)

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This entry shales the receipt of the \$400 rebals and the federal and nonfederal allocated shares. All the amounts are in parantheses to indicate that they are negative entries, that is, the amounts are subtracted from the corresponding Schedule H4 totals (thus reducing the tederal and nonfederal shares of disbursements). The year-to-date total is also reduced by the amount of the rebale.

RECEPT OF REBATE (A/LINE 15) (METHOD 2)

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The \$400 repails is reported as a receipt under the category "offsets to operating exponditures" (Ling 15 of the Form \$X Detelled Summary Page). The reballs has to be itemized on Schedule A because it exceeds \$200.

TRANSFER OF NONFEDERAL SHARE (H4) (METHOD 2)

CHARLING REMENT, OCH EDITTE HA Charles in Light	JOINT FEDERAL MON-FEDERAL ACTIVITY SCHEDULE				FOR LIME 21 P	
National Committee						
A NUMBER OF STREET COMMENTS OF	REPOSERANT	200	TESTAL MICHAE	MARM BANK	MARKET STATES	
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Based on the 75/25 allocation ratio for seministrative expenses, the federal account invel return \$100 (25 december of the reballs) to the modederal account. The transfer to the nonfederal account is shown on Schedule H4. The entry explains the meason for the transfer and includes a cross-reference to the Schedule A where the reballs is itemzed.

|--|